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March 23, 2020

VIA E-MAIL AND ECF

Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 21B
New York, NY 10007

Re: United States v. Jones, S4 17 Cr. 791

Dear Judge Kaplan:

We write respectfully to request an extension of the deadline for Defendant Theryn Jones' reply brief in support of his motion for a judgment of acquittal or a new trial, Dkt. No. 174. The current deadline for Mr. Jones' reply is April 2, 2020.

Prior to our receipt of the Government's opposition, the Bureau of Prisons placed a ban on all visitation, including legal visits, at least until April 12, 2020, and potentially longer. As a result, and because of other limitations on our ability to contact Mr. Jones, we have been unable to have a privileged conversation with him regarding the Government's opposition to his motion and our proposed reply brief. We have requested a legal phone call with Mr. Jones, which we understand would not be monitored, but we have not received any indication that the request will be granted, and if so, when.

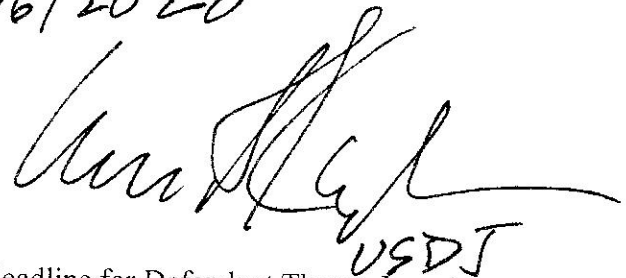
In light of our inability to communicate with Mr. Jones about his defense and the uncertainty about when we will be able to do so, we respectfully request that the deadline to file Mr. Jones' reply be extended until one week after the visitation ban at MCC is lifted and we have had an opportunity to confer with him. No previous request for an extension has been made with respect to Mr. Jones' reply brief, and the Government has no objection to this request.

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MEM. ENDORSED

Time extended until
4/16/2020


USDS

3/24/2020